



MONTANA
TELECOMMUNICATIONS
ASSOCIATION

October 31, 2013

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

RE: *Lifeline Reform*: WC Docket No. 11-42
E-Rate Reform: WC Docket No. 13-184

Dear Ms. Dortch,

On October 30, 2013, the undersigned, on behalf of the Montana Telecommunications Association (MTA), met with Kim Scardino, James Bachtell, Charles Eberle and Radhika Farmarkar of the Wireline Competition Bureau to discuss the above-referenced reform dockets.

Regarding Lifeline reform, MTA noted that the 2012 *Reform Order* appears to have stabilized the rampant growth of Lifeline support that previously characterized the program. MTA is not yet convinced that the savings resulting from the *Reform Order* are permanent. Should the program resume its previous growth pattern, MTA reiterated its recommendation that further reforms should focus on the financial incentives still inherent in the program which encourage prepaid wireless providers to enter the market.

With regard to E-Rate reforms, MTA urged the Commission to retain a budget for the E-Rate program, lest growth of one program effectively were to cannibalize another. MTA recommended that the Commission determine accurately determine whether broadband access by schools and libraries is a matter of accessibility (broadband infrastructure deployment) or affordability. MTA observed that in the vast majority of instances, the issue is one of affordability, not accessibility. In cases where infrastructure access may be determined only after thorough investigation to be the issue, then the Commission should, as a matter of first resolve, look for ways to leverage existing network facilities rather than waste scarce E-Rate resources on construction of new facilities.

Respectfully submitted,

/s/

Geoffrey A. Feiss, General Manager